

**REMARKS/ARGUMENTS**

**STATUS OF THE APPLICATION**

Claims 1-2, 4-25, 49-64, and 66-70 are pending. Claims 1, 4, 7, 9, 20, 23, 25, 49, 62-63, and 67-69 have been amended. Claims 3, 5, and 65 have been canceled. Support for amended claims can be found in the specification, such as page 9, lines 21-23. No new matter has been added.

Claims 20 and 22-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent 5,866,949 to Schueller ("Schueller") in view of U.S. patent 5,985,695 to Freyman ("Freyman") and U.S. patent 5,663,594 to Kimura ("Kimura").

Claims 1-2, 4, 6-10, 12-19, 49-59, and 61 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schueller in view of U.S. patent 5,866,949 to Zenner ("Zenner") and Freyman.

Claims 21 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Schueller, Freyman, and Kimura in view of admitted prior art ("APA").

Claims 25 and 62-69 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schueller in view of Zenner, APA, and U.S. patent 5,796,912 to Fukutomi ("Fukutomi").

Claims 3, 5, 11, 60, and 70 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schueller, Zenner, and Freyman, and further in view of APA.

**THE CLAIMS**

Reconsideration of the rejections and allowance of the claims are respectfully requested in light of the amendments and following remarks.

**NOT ADMITTED PRIOR ART**

Applicants submit that Table 2 of the present application is not admitted prior art ("APA"). Applicants' own foundational work should not be treated as APA solely because knowledge of this work is discussed. Table 2 simply lists typical CTEs for various package components as concluded by applicants. Nowhere does the specification suggest that another

inventive entity has determined, or even agrees with, the ranges disclosed in Table 2. Accordingly, applicants respectfully disagree with examiner's proposition that Table 2 is APA, and Table 2 should not be considered APA.

NOT SUGGESTED BY CITED REFERENCES

Applicants respectfully submit that the cited references do not discuss or suggest each and every feature of the present invention as claimed, and therefore the claims should be allowable.

Transition Medium Composition

For example, claim 20 recites, in part, "the transition medium and the mold cap each comprising a first mold compound." Nowhere do the cited references discuss or suggest this claimed feature. In fact, the cited references teach using other materials, such as a metal sheet or foil (Schueller: col. 9, lines 17-52), polyimide film (Fukutomi: col. 17, lines 5-9; col. 17, line 64 - col. 18, line 7), or an adhesive (Freyman: col. 8, lines 1-2) for the components examiner analogizes to the claimed transition medium. As independent claims 25, 49, 62, and 67 recite similar features, this rationale also applies to them. Accordingly, independent claims 20, 25, 49, 62, and 67 should be allowed for at least this reason. Claims 21-24, 50-61, 63-64, 66, and 68, which depend from these independent claims, should be allowed for at least a similar rationale, as well as the additional features they recite.

Thickness

As another example, claim 1 recites, in part, "the first thickness of the silicon die is less than the second thickness." A similar feature is also recited in each of the independent claims 25, 49, 62, 67, and 69. However, nowhere do the cited references show this feature. Schueller, Freyman, Kimura, Fukutomi, and Zenner all clearly discuss a die having a thickness much greater than its purported transition medium. By engaging in impermissible hindsight, examiner has selectively chosen a miscellany of components from the cited references to allegedly show the claimed feature, even though none of the cited references, individually or in combination, provide a suggestion or motivation to do so. Accordingly, claims 25, 49, 62, 67, and 69 should be allowed for at least this reason. Claims 50-61, 63-64, 66, 68, and 70, which

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depend from these independent claims, should be allowed for at least a similar rationale, as well as the additional features they recite.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

  
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